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Amy, Erika, Tori, Jenny, and Jessica

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

“Amy,” et. al.,

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

Case No: 3:19-CV-02184PJH

CHART RE PLAINTIFFS’ MOTION FOR  
SUMMARY JUDGMENT

Judge: Honorable Phyllis J. Hamilton  
Chief United States District Court Judge

Plaintiffs submit the following revised chart of evidence per the Court's direction in its order of March 8, 2021 (Dkt. # 170) including counsel's understanding of what is shown in the unredacted version of the images in question.



The first entry on the following chart indicates the location of evidence of Defendant's admission to possession of certain computer media which contained all of the images of the Plaintiffs herein.

Plaintiff	Identity	Sexual Content	Found in Defendant's Possession
All Plaintiffs			<p>1. <u>Plea agreement</u> <i>United States v. Curtis</i>, See ¶ 2 where Def. admits possession of electronic media.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 1 at Dkt # 139-4, p. 33.</li> </ul> <p>2. <u>Transcript of plea hearing</u> where Def. orally admits possession of computer media containing child pornography,</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 2 at Dkt # 139-4 pp; 53-55.</li> </ul> <p>3. <u>HSI Report of Investigation</u> listing same computer media as plea agreement.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec of Kevin Laws ISO Pltffs' MSJ, Ex. 2 at Dkt # 139-4, p. 170.</li> </ul>
Amy	<u>Identified by Amy herself</u> in Dec. of Amy ISO Pltffs MSJ, ¶ 5, P. 2, ll. 13-20 & Ex. 1.	File Name: [REDACTED].jpg  Amy describes the sexual content of the image at paragraph 5 of her declaration.	1. <u>NCMEC report</u> of identification of "Misty series image: [REDACTED].jpg.

	<ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, ¶ 5, p. 375, ll. 13-20, p.377.</li> </ul> <p>Sanitized image which is Ex. 1 to Amy Dec. is same image as 2.</p> <p><u>Sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.12 Dkt No. 139-4, p.256.</li> </ul>	<p>Dec. of Amy ISO Pltffs MSJ, ¶ 5, P. 2, ll. 13-20 &amp; Ex. 1.</p> <p>Dec of Amy ISO Plaintiffs' MSJ ¶ 5, &amp; Ex.1, Dkt No. 139-4, p. 375, ll. 13-20 &amp; p. 377,</p>	<ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 89.</li> </ul> <p>2. <u>Sanitized image</u> received from HSI and identified by Amy.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.12 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.256.</li> </ul>
Erika/Tori	<p><u>Identified by their mother</u> (as to one of her two daughters, not clear which individual girl) in paragraph 6, Dec. of Jane Smith Re Erika/PinkHeartSisters1 and Tori/PinkHeartSisters2 ISO Pltffs MSJ, ¶ 6, p. 2, ll. 12-16, p. 3, ll. 13-24, &amp; Ex. 2.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, ¶ 6, p. 367, ll. 12-16, p.368, ll. 13-24, &amp; p.373.</li> </ul> <p>Ex. 2 to Jane Smith Declaration is same image as</p>	<p>File Name: [REDACTED].jpg</p> <p>Letter of defense counsel Shawn Halbert acknowledges re PinkHeartSisters “the handful of images show actual sexual contact” at page 10 of Ex. 6 to Dec. of Carol L. Hepburn ISO Pltffs’ MSJ</p> <p><u>Located at</u> Dkt. No. 139-4, p. 109, paragraph “Pink Heart Sisters”</p> <p>No declaration describes the redacted content of photo which is Ex. 2 to Jane Smith Declaration and Ex. 9 (2d photo) to Kevin Laws Declaration. Plaintiffs rely on court’s <i>in camera</i> view of the image in that regard.</p>	<p>1. <u>NCMEC report</u> of identification of “PinkHeartSisters series image: [REDACTED].jpg.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 90.</li> </ul> <p>3. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by mother Jane Smith</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.13 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.259.</li> </ul>

	<p><u>. Sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.13 Dkt No. 139-4, p.259.</li> </ul>		
Jenny	<p><u>Identified by Jenny herself</u> in Dec. of Jenny ISO Pltff's MSJ, p. 2, ll. 13-23, &amp; Ex. 1.</p> <p><u>Located at</u> Dkt. No. 139-4, p. 358, ¶5, ll. 13-25. &amp; p. 361.</p>	<p>File Name: [REDACTED].jpg</p> <p>Letter of defense counsel Shawn Halbert acknowledges re Jenny “. . . these images are more graphic that (sic) for the other victims.” at page 10 of Ex. 6 to Dec. of Carol L. Hepburn ISO Pltffs' MSJ</p> <p><u>Located at</u> Dkt. No. 139-4, p. 109, paragraph “Jenny”</p> <p>2. In paragraph 5 of her declaration Jenny describes the sexual content of the photo which is Ex. 1 (Dkt. No. 139-4, p. 361) to Declaration of Jenny and Ex. 10 (Dkt. No. 139-4, p. 252) to Kevin Laws Declaration. Plaintiffs further rely on court's <i>in camera</i> view of the image in that regard.</p>	<p><u>. NCMEC report</u> of identification of “Jenny” series image: [REDACTED].jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt No. 139-4 p. 84</li> </ul> <p>2. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by Jenny herself</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.10 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.252.</li> </ul>
Jessica	<p><u>Identified by her mother</u> [REDACTED] in Dec. of [REDACTED] ISO Pltffs' MSJ, p. 2, ll. 8-11, 19-22, &amp; Ex. 1</p>	<p>[REDACTED].jpg</p> <p>Letter of defense counsel Shawn Halbert acknowledges re Jessica “. . . the other [photo] is essentially a cover photo with a face and a p****s . .</p>	<p>1. <u>NCMEC report</u> of identification of “Jessica” series image: [REDACTED].jpg.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt No. 139-4 p. 85.</li> </ul>

	<p>Ex. 1 to [REDACTED] Declaration is same image as . <u>Sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.11 Dkt No. 139-4, p.254.</li> </ul>	<p>.” at page 10 of Ex. 6 to Dec. of Carol L. Hepburn ISO Pltffs’ MSJ</p> <p><u>Located at</u> Dkt. No. 139-4, p. 109, paragraph “Jessica”</p> <p>No declaration describes the redacted content of photo which is Ex. 1 to Declaration of [REDACTED] ISO Pltffs’ MSJ Declaration and Ex. 11 to Kevin Laws Declaration. Plaintiffs rely on court’s <i>in camera</i> view of the image in that regard.</p>	<p>2. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by mother.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.11 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.254.</li> </ul>
Lily	<p>1. <u>Identified by</u> POC SA Joshua Findley at Dec. of Joshua Findley ISO Pltffs MSJ, p. 2, ¶ 4, ll. 14-21, &amp; p. 3, ¶ 8, ll. 7-9, &amp; Ex. 1 thereto,</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt No. 139-4, p.343, ¶ 4, ll. 14-21, p. 344, ¶ 8, ll. 7-9, &amp; p. 345.</li> </ul> <p>2. The same image is <u>Identified as Lily</u> by POC Ret. Det <u>Roy Shepherd</u> at Dec. of Roy Shepherd ISO Pltffs MSJ, ¶¶ 3, 5, 6, &amp; 10, p. 2, ll. 12-15, p. 3, ll. 2-4, 8-10, 17-21, p.4, ll. 1-3 &amp; Ex. 1</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 350, ll. 12-15, p.</li> </ul>	<p>Transcend Thumb Drive File Path: [REDACTED] File Name: [REDACTED].jpg</p> <p>The sexual content of the photo is described by POC SA Joshua Findley at paragraph 8 of his declaration.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt No. 139-4, p.344, ll. 7-9.</li> </ul> <p>The sexual content of the photo is similarly described by POC Ret. Det. Roy Shepherd at paragraph 10 of his declaration.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt No. 139-4, p.352, ll. 1-3.</li> </ul>	<p>1. <u>NCMEC report of</u> identification of “Vicky series image: [REDACTED].jpg.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt No. 139-4 p. 93</li> </ul> <p>2. The <u>same image was found</u> by Kevin Laws, on the Transcend thumb drive, Dec. of Kevin Laws ISO Pltffs MSJ, p. 4, ll. 1-4, p. 14, ll. 10-18, &amp; Ex. 9.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 147, ll. 1-4, 13-18, p. 157, ll. 10-18.</li> </ul> <p>3. <u>Sanitized image</u> received from HSI and identified by POCs Findley and Shepherd.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.9 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.237.</li> </ul>

	<p>351, ll. 2-4, 8-10, 17-21, p.352, ll. 1-3 &amp; p. 353</p> <p>Ex. 1 to the Declarations of each Findley and Shepherd is same image as the <u>sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.9 Dkt No. 139-4, p.237.</li> </ul>		
Maureen	<p>1. <u>Identified by herself</u> in Dec. of Maureen ISO Pltffs MSJ, ¶ 8, p. 2, l. 25 – p. 3, l. 6, &amp; Ex. 2.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 282, l. 25 – p. 283, l. 6, &amp; p. 286.</li> </ul> <p>2. <u>Identified by Ret. Agent J. Thomas Rothrock</u> in Dec. of J. Thomas Rothrock ISO Pltffs MSJ, p. 3, ll. 17-24, p. 4, ll. 12-14. &amp; Ex. 1.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p.289 ll. 17-24, p. 290, ll. 12-14 p. 292</li> </ul>	<p>.jpg</p> <p>The sexual content of the photo is described by Maureen in her declaration at paragraph 8</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 282, l. 25 – p. 283, l. 6,</li> </ul> <p>The sexual content of the photo is similarly described by POC J. Thomas Rothrock at paragraph 11 of his declaration</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 290, ll. 12-14</li> </ul>	<p>1. <u>NCMEC report</u> of identification of “Lighthouse” series image:</p> <p>.jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 86.</li> </ul> <p>2. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by Maureen and Rothrock.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.6 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.208.</li> </ul>

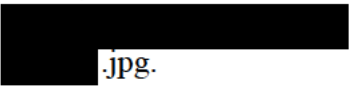

	<p>Ex. 2 to the Declaration of Maureen and Ex. 1 to the Declaration of Rothrock is same image as the <u>sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.6 Dkt No. 139-4, p.208.</li> </ul>		
Mya	<p>1. <u>Identified by her mother</u>, Jane Roe in paragraphs 3 &amp; 6 Dec. of Jane Roe RE: Mya/Sweet Pink Sugar and Pia/Sweet White Sugar ISO Pltffs MSJ, p. 2, ll. 1'2-15, p.3, ll. 4-9, &amp; Ex. 1.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, ¶ 3, p. 305 ll. 12-15, ¶ 6, p. 306, ll.4-9, &amp; p. 310.</li> </ul> <p>2. <u>Identified by Corporal Adele Brown</u> in paragraphs 5 &amp; 11, Dec. Re: Mya/Sweet Pink Sugar and Pia/Sweet White Sugar ISO Pltffs MSJ, p. 3, ll. 9-13, p. 4 l. 21 – p. 5, l. 5 &amp; Ex. 1.</p>	<p>SanDisk Cruzar Thumbdrive File Path: [REDACTED] [REDACTED] File Name: [REDACTED].jpg.</p>	<p>1. <u>NCMEC report</u> of identification of “Sweet Sugar” series image: [REDACTED].jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 91.</li> </ul> <p>2. <u>The same image was found</u> by Kevin Laws, on the San Disk Cruzar thumb drive, Dec. of Kevin Laws ISO Pltffs MSJ, p. 4, ll. 1-4,13-18, p. 10, ll. 13-17, &amp; Ex. 8.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 147, ll. 1-4, 13-18, p. 153, ll. 13-17, p. 219</li> </ul> <p>3. <u>Sanitized image</u> received from HSI and identified by Jane Roe and Corporal Brown.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.8 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.219.</li> </ul>




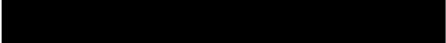
	<ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. Nol. 139-4, ¶ 5, p. 317, ll. 9-13, ¶ 11, p. 318, l. 21 – p. 319, l. 5, &amp; P. 323</li> </ul> <p>Ex. 1 to each of the Declarations of Jane Roe and Corporal Brown is same image as the <u>sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.8 Dkt No. 139-4, p.219.</li> </ul>		
Pia	<p>Kaitlyn Calder</p> <p><u>Identified by Corporal Adele Brown</u> in Dec. Re: Mya/Sweet Pink Sugar and Pia/Sweet White Sugar ISO Pltffs MSJ, ¶¶ 5 &amp; 13, p. 3, ll. 14-18, p. 4 l. 14-25, &amp; Ex. 3.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. Nol. 139-4, ¶¶ 5 &amp; 13, p. 317, ll. 14-18, p. 319, ll. 14-25, &amp; P. 327</li> </ul> <p>Ex. 3 to the Declaration of Corporal Brown is same image as the</p>	<p>File Name: [REDACTED].jpg.</p> <p>The Sexual content of the photo is described by POC Corporal Brown in paragraph 13 of her declaration</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. Nol. 139-4, ¶13, p. 319, ll. 14-25.</li> </ul>	<p>1. <u>NCMEC report of identification of “Sweet Sugar” series image:</u> [REDACTED].jpg.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 91.</li> </ul> <p>2. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by Corporal Brown.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.8 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.224.</li> </ul>



	<p><u>sanitized image</u> received from HSI by Kevin Laws</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.8 Dkt No. 139-4, p.224.</li> </ul>		
Sally	<p><u>Identified by her father</u> in paragraph 6 to Dec. of John Doe ISO Pltffs MSJ, p. 3, ll. 5-9, &amp; Ex. 4.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 270, ll. 5-9, &amp; p. 274.</li> </ul> <p>Ex. 4 to the Dec. of John Doe is the same image as the sanitized image received from HSI by Kevin Laws and located at Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 149, ll.Dkt No. 139-4, p.202</p>	<p>File Name: [REDACTED] .jpg</p> <p>This is the same image as that of Sierra [Transcend Thumb drive</p> <p>File Path: [REDACTED]</p> <p>File Name: [REDACTED] .jpg.] but with the frame expanded to show Sally as a voyeur of the sexual behavior of Sierra. The sexual content of the image with only Sierra is described by Kevin Laws at paragraph 9(b)(i) of his declaration</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, ¶9(b)(i), p. 149, ll. 13-20.</li> </ul>	<p>1. <u>NCMEC report</u> of identification of “Jan_Socks” series image: [REDACTED] .jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 82.</li> </ul> <p>2. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by John Doe</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 149, ll.Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.202.</li> </ul>
Sarah	<p>1. <u>Identified by Sarah herself</u> at paragraph 6, Dec. of Sarah ISO Pltffs MSJ p. 3, ¶ 6, ll. 19-25, &amp; Ex. 1.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 295, ll. 19-25, &amp; p. 298</li> </ul>	<p>Name: [REDACTED] .jpg</p> <p>The sexual content of Sarah’s image is described by Sarah in her declaration at paragraph 6</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 295, ll. 19-25;</li> </ul> <p>The sexual content is similarly described by Det.</p>	<p>1. <u>NCMEC report</u> of identification of “Marineland” series image: [REDACTED] .jpg.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 87.</li> </ul> <p>2. <u>Sanitized image</u> received from his by Kevin Laws and identified by Sarah and Det. Behymer.</p>

	<p>2. <u>Identified by Ret. Det. Deborah Behymer</u>, at paragraph 6, Dec. of Deborah Behymer ISO Pltffs MSJ, p.2, l.16 – p. 3, l.2, &amp; Ex. 1.</p> <ul style="list-style-type: none"> <li>• <u>Located at Dkt. No. 139-4, p. 300, l.16 – p.301, l. 2 &amp; p. 303.</u></li> </ul> <p>Ex. 1 to each of the declarations of Sarah and Det. Behymer is the same image as the <u>sanitized image</u> received from HSI by Kevin Laws and</p> <ul style="list-style-type: none"> <li>• <u>Located at Dec. of Kevin Laws ISO Pltffs MSJ Ex.7 Dkt No. 139-4, p.213.</u></li> </ul>	<p>Behymer in paragraph 6 of her declaration</p> <ul style="list-style-type: none"> <li>• <u>Located at Dkt. No. 139-4, p. 301, ll. 1-7.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Located at Dec. of Kevin Laws ISO Pltffs MSJ Ex.7 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.213.</u></li> </ul>
Savannah	<p><u>Identified by her mother</u> in paragraphs 2 &amp; 4, Dec. of Jane Doe ISO Pltffs MSJ p.2, ll. 7-13. P. 3, ll. 5-7, &amp; Ex. 3.</p> <ul style="list-style-type: none"> <li>• <u>Located at Dkt. No. 139-4, ¶¶ 2 &amp; 4, p. 276, ll. 7-13, p. 277, ll. 5-7, &amp; p. 200</u></li> </ul> <p>Ex. 3 to the Dec. of Jane Doe is the same image as the sanitized image received from HSI by Kevin Laws and located at Dec. of</p>	<p>San Disk Cruzar File Path: 1\little File Name: .jpg.</p> <p>The sexual content of the photo is described by Kevin Laws at paragraph 9(b)(ii) of his declaration, pp. 7, l. 27 – p. 8, l. 9.</p> <ul style="list-style-type: none"> <li>• <u>Located at Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p. 150, l. 27 – p. 151, l. 9,.</u></li> </ul>	<p>1. <u>NCMEC report</u> of identification of “Jan_Socks” series image: .jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 82.</u></li> </ul> <p>2. <u>Sanitized image</u> received from HSI and identified by Jane Doe.</p> <ul style="list-style-type: none"> <li>• <u>Located at Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.200.</u></li> </ul>

	Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p.200		
Sierra	<p><u>Identified by her father</u> John Doe at paragraphs 3, 4, &amp; 6, in Dec. of John Doe ISO Pltffs MSJ, p.2, ll. 7-11, p. 3, ll. 5-9, &amp; Ex. 1</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, ¶¶ 3,4,&amp; 6, p.269, ll. 12-24, p. 270, ll. 5-9, &amp; p. 271.</li> </ul> <p>Ex. 1 to the Declaration of John Doe is the same image as <u>the sanitized image</u> received from HSI and</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p.205.</li> </ul>	<p>Transcend Thumb drive File Path: [REDACTED] File Name: [REDACTED].jpg.</p> <p>The sexual content of the image is described by Kevin Laws at paragraph 9(b)(i) at page 6, ll. 13-20.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 149, ll. 13-20.</li> </ul>	<p>1. <u>NCMEC report</u> of identification of “Jan_socks” series image: [REDACTED].jpg.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 82.</li> </ul> <p>2. <u>The same image was found</u> by Kevin Laws, on the Transcend thumb drive, Dec. of Kevin Laws ISO Pltffs MSJ, p. 4, ll. 1-4, 13-18, p. 6, ll. 13-20, &amp; Ex. 5.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 147, ll. 1-4, 13-18, p. 149, ll. 13-20, p. 205</li> </ul> <p>3. <u>Sanitized image</u> received from HSI and identified by John Doe and</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.205.</li> </ul>
Skylar	<p><u>Identified by her mother</u> in paragraphs 2 &amp; 4, Dec. of Jane Doe ISO Pltffs MSJ p.2, ll. 7-13. P. 2, l. 26 – p. 3, l. 3, &amp; Ex. 2.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, ¶¶ 2 &amp; 4, p. 276, ll. 7-13, p. 276, l. 26 – p.277 l. 3, &amp; p. 278</li> </ul>	<p>SanDisk Cruzer File Path: Partition-1\little File Name: [REDACTED].jpg</p> <p>The sexual content of this image of Skylar is described in paragraph 9(b)(iii) of the Declaration of Kevin Laws ISO Pltffs’ MSJ</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p.151, ll.16-24.</li> </ul>	<p>1. <u>NCMEC report</u> of identification of “Jan_socks” series image: [REDACTED].jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 82.</li> </ul> <p>2. <u>The same image was found</u> by Kevin Laws, on the San Disk Cruzer thumb drive, Dec. of Kevin Laws ISO Pltffs MSJ, ¶</p>

	<p>Ex. 2 to the Dec. of Jane Doe is the same image as the <u>Sanitized image</u> received from HSI by Kevin Laws and</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p.198.</li> </ul>		<p>9(b)(iii), p. 4, ll. 1-4,13-18, p. 8, ll. 12-24, &amp; Ex. 5.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 147, ll. 1-4, 13-18, p. 151, ll. 12-24, p. 198</li> </ul> <p>3. <u>Sanitized image</u> received from HSI by Kevin Laws and identified by Jane Doe and</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.198.</li> </ul>
Violet	<p>1. <u>Identified by her mother</u> in paragraphs 3 &amp; 5, Dec. of Violet's Mother Re: Violet and At School Series ISO Pltffs MSJ, p.2, ll. 12-14, 23-25, &amp; Ex 1.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 261, ll. 13-14, 23-25, &amp; p. 263.</li> </ul> <p>2. <u>Identified by S/A Stetler</u> in Dec. of S/A Jeffrey F. Stetler ISO Pltffs MSJ, ¶¶ 4, 6, &amp; 7, p.2. ll. 17-23, p. 3, ll. 7-13, &amp; Ex. 1;</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 265, ll. 16-23, p.266, ll. 3-13, &amp; p. 267.</li> </ul> <p>3. The image which is Ex. 1 to the declarations of Violet's Mother</p>	<p>.jpg</p> <p>The sexual content of this photo of Violet is described by POC S/A Jeffrey Stetler at paragraph 7 of Dec. of S/A Jeffrey Stetler ISO Pltffs' MSJ, p. ll. 7-13.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p.266, ll. 7-13.</li> </ul> <p>The sexual content of Violet's image is similarly described by Kevin Laws in his Declaration ISO Pltffs MSJ at paragraph 9(a), p. 5, ll. 6-24</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 148, ll. 6-24.</li> </ul>	<p>1. <u>NCMEC report of</u> identification of "At School" series image:</p> <p>.jpg</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Hepburn Dec. ISO Pltffs MSJ, Ex. 4 at Dkt # 139-4 p. 81.</li> </ul> <p>2. <u>The same image, though with a different file name, was found by</u> Kevin Laws, on the San Disk Cruzer and Transcend thumb drives, Dec. of Kevin Laws ISO Pltffs MSJ, p. 4, ll. 1-4,13-18, p. 5, ll. 6-24, &amp; Ex. 4.</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dkt. No. 139-4, p. 147, ll. 1-4, 13-18, p. 148, ll. 6-24, &amp; p. 195.</li> </ul> <p>3. <u>Sanitized image</u> received from HSI and identified by Jane Doe and</p> <ul style="list-style-type: none"> <li>• <u>Located at</u> Dec. of Kevin Laws ISO Pltffs MSJ Ex.5 Dkt No. 139-4, p. 158, l. 20 – p. 159, l. 17, &amp; p.195.</li> </ul>

and Jeffrey Stetler  
is the same image  
as the sanitized  
image received  
from HSI by Kevin  
Laws and

- Located at  
Dec. of Kevin  
Laws ISO  
Pltffs MSJ  
Ex.4 Dkt No.  
139-4, p.195.

Dated this 15<sup>th</sup> day of March, 2021.

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